

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MATT PASQUINELLI and BRYAN
PAYSEN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiffs,

v.

HUMBL, LLC., BRIAN FOOTE,
JEFFREY HINSHAW, GEORGE
SHARP, KAREN GARCIA, and
MICHELE RIVERA,

Defendants.

Case No.: 1:23-CV-00743-CFC

STIPULATION AND ~~PROPOSED~~ ORDER REGARDING
SCHEDULING ORDER

This Stipulation is made by and between Plaintiffs Matt Pasquinelli and Bryan Paysen, individually and on behalf of all others similarly situated (collectively, the "Plaintiffs"), Respondents Humbl, LLC, Brian Foote, Jeffrey Hinshaw, Karen Garcia, and Michele Rivera (collectively, the "HUMBL Defendants"), and George Sharp (together with the Plaintiffs and the HUMBL Defendants, the "Parties").

WHEREAS, on July 7, 2023, the U.S. District Court for the Southern District of California transferred this case to this Court under 28 U.S.C. § 1404(a) (Dkt. 47).

WHEREAS, on September 14, 2023, the Parties filed their *Joint Statement of the Parties Pursuant to Local Rule 81.2* (Dkt. 66).

WHEREAS, on October 27, 2022, Mr. Sharp filed his *Motion to Dismiss for Failure to State a Claim* under Rule 12(b)(6) (Dkt. 33).

WHEREAS, the parties have conferred and to clarify and coordinate on the briefing schedule, the parties have agreed as follows, subject to the Court's approval:

- The HUMBL Defendants shall serve their motion to dismiss, and Mr. Sharp shall serve his amended motion to dismiss, by October 30, 2023.
- Plaintiffs shall serve their responses to the HUMBL Defendants' motion to dismiss and to Mr. Sharp's amended motion to dismiss by December 29, 2023.
- The HUMBL Defendants shall serve their reply in support of their motion to dismiss, and Mr. Sharp shall serve his reply in support of his amended motion to dismiss, by January 29, 2024.

NOW THEREFORE, the Parties respectfully request that the Court establish the deadlines set forth herein.

Dated: September 14, 2023

Respectfully submitted,

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SO ORDERED this 15th day of September, 2023.



Chief Judge Colm F. Connolly